

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In re:

BLOCKFI INC., *et al.*,
Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)
(Jointly Administered under a Confirmed Plan²)
Hearing Date: February 6, 2025 @ 10:00 a.m. ET
Response Deadline: January 30, 2025 @ 4:00 p.m. ET
Oral Argument Waived Unless Response Timely Filed

**NOTICE OF WIND-DOWN DEBTORS' MOTION FOR ENTRY OF AN
ORDER ENFORCING: (I) THE BAR DATE ORDER AND WALLET WITHDRAWAL
ORDER AND (II) THE PLAN AND CONFIRMATION ORDER WITH RESPECT TO
CLAIMS ASSERTED AGAINST SURETY BONDS**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* (the “Plan”) [Docket No. 1609]. Unless otherwise indicated, capitalized terms used but not defined in this Objection shall have the meanings ascribed to them in the Plan.

PLEASE TAKE NOTICE that a hearing on the Wind-Down Debtors' Motion for Entry of an Order Enforcing: (I) the Bar Date Order and Wallet Withdrawal Order, and (II) the Plan and Confirmation Order with Respect to Claims Asserted Against Surety Bonds (the "Motion") will be held on **February 6, 2025, at 10:00 AM ET**, or as soon thereafter as counsel may be heard, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey (the "Bankruptcy Court"), 402 East State Street, Trenton, New Jersey 08608.

PLEASE TAKE FURTHER NOTICE that the Motion and its attachments set forth the relevant factual bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed with the Clerk of the Court, together with proof of service thereof, and served and received by **January 30, 2025, at 4:00 p.m. ET**, upon the undersigned counsel for the Wind-Down Debtors.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be (a) in writing, (b) comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey, and (c) state with particularity the legal and factual basis for the objection. Unless responses are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

[Signature page to follow.]

Dated: January 16, 2025

/s/ Daniel M. Stolz

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